

EXHIBIT 2

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

RED TREE INVESTMENTS, LLC,

Plaintiff,

-against-

PETROLEOS DE VENEZUELA, S.A. and
PDVSA PETROLEO, S.A.,

Defendants.

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT IN
LIEU OF COMPLAINT**

Oral Argument Is Requested

Index No. _____

PLEASE TAKE NOTICE that, upon the summons dated February 15, 2019, and the annexed affidavits of Daniel Wallitt, sworn to on January 25, 2019, and the affidavit of Stephen Broome, with their exhibits annexed thereto, the Plaintiff, Red Tree Investments, LLC, will move this Court located at the New York County Courthouse at 60 Centre Street, New York, New York, Motion Submission Part, Room 130, on March 21, 2019, at 9:00 AM, or as soon thereafter as counsel can be heard for summary judgment in lieu of complaint, pursuant to C.P.L.R. § 3213, in favor of the plaintiff and against the defendants for the sum of \$118,359,515.23, together with interest, upon the grounds that this action is based upon an instrument for the payment of money only and that there is no defense thereto, and for such and other further relief as the Court may deem just and proper; and

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 3213, answering papers, if any, shall be served upon undersigned counsel at least ten (10) days before the return date of this motion. Reply or responding affidavits shall be served at least one day before such time.

Dated: February 15, 2019

Respectfully submitted,

/s/ Stephen A. Broome
By: Stephen A. Broome
Quinn Emanuel Urquhart & Sullivan, LLP
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/s/ Mark C. Zauderer
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To: Petróleos de Venezuela, S.A.

Defendant

c/o Corporation Service Company
1180 Avenue of the Americas, Suite 210
New York, NY 10036

To: PDVSA Petróleo, S.A.

Defendant

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